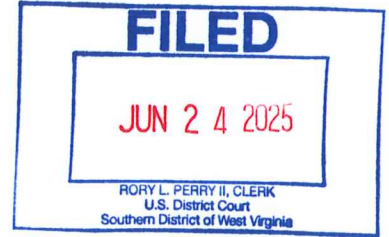


Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

## UNITED STATES DISTRICT COURT

for the

Southern District of West Virginia



James W. Shepherd

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-  
Sally T. Shepherd

Walton S. Shepherd III

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No.

2:25-cv-00394  
(to be filled in by the Clerk's Office)Jury Trial: (check one) ☒ Yes ☐ No

## COMPLAINT FOR A CIVIL CASE

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

James Shepherd

Street Address

607 Wood Rd

City and County

Charleston WV

State and Zip Code

25302

Telephone Number

304 610 9751

E-mail Address

607 Wood@gmail.com

## B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

Defendant No. 1

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

Sally T. Shepherd  
Ret  
(Farm) Haynes Branch End House  
Sissonville WV (Horse Farm)

304 545 3145 304 988 1717

Defendant No. 2

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

Walton S. Shepherd JR  
Attorney  
(Farm) Haynes B (End House)  
Horse Farm Sissonville WV  
WV

304 984 3306 304 545 3467

Defendant No. 3

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

Defendant No. 4

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal question ☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

*Elder Abuse (Petitioner is 75 years old)  
False Imprisonment  
Habeas Corpus  
Auto Theft  
Mental Abuse  
False Accusation of Serious Mental  
Abduction*

**B. If the Basis for Jurisdiction Is Diversity of Citizenship****1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name) James W. Shepherd, is a citizen of the State of (name) WV.

**b. If the plaintiff is a corporation**

The plaintiff, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

**2. The Defendant(s)****a. If the defendant is an individual**

The defendant, (name) Sally T. Shepherd, is a citizen of the State of (name) WV. Or is a citizen of (foreign nation) \_\_\_\_\_.



(2)  
b. If the defendant is a corporation

The defendant, (name) Walter Shephard Jr, is incorporated under  
the laws of the State of (name) WV Citizen, and has its  
principal place of business in the State of (name) lawyer in office  
Or is incorporated under the laws of (foreign nation) Sissonville,  
and has its principal place of business in (name) \_\_\_\_\_.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

I had to walk for 2 days to town - City bus -  
Car stolen from me and Keys taken (94 Mercedes)  
Now another car is gone (2025 VW)  
Brother quote: I won't let you drive!  
That is theft, abuse, false imprisonment

### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

In Jan 2025, my wife and I disagreed - I hired  
an attorney but no immediate divorce was wanted  
at some point ~~my~~ a doctor suggested we part for  
a while - my Brother and Sister in law asked  
me to stay at their farm on Haynes Branch. Then I wanted  
to leave and my car keys and car were made unavailable  
Continued

### IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Not sure the abuse is never stopped  
since About Jan 10 until today.  
I hear over and over - you need help  
Dave Claymen psychologist - Tony said for me  
+ called him He has worked professionally

### III Statement of Claim

my brother Def II Walton was not too involved, but the claims of serious mental issues were constant. I ~~am~~ have Never been assessed with any mental issue, other than is stated in a recent evaluation by my psychologist Dr Selber-Nelson June 6 evaluation attached hereto. I have been tormented, abused and nearly driven mad by police, vans, hospital uniformed trucks (about 20 or so) and Sally perpetually and non-stop volunteers to take me to mental wards whether CAME 6th floor (which was awful) Lutheran Mental Hospital in Cleveland - my family refused to let me get out of the car and dumped me at Cleveland Clin Lutheran Mental Hospital for 8 days (No diagnosis except mania). The Mania due to false imprisonment outrage and spite between family members. Neicos and Nephews would not hear from my therapist recent report stating "He is seen here as" talks too much & enjoying life". The abuse continues every day and all night for months & months.



**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: \_\_\_\_\_

Signature of Plaintiff \_\_\_\_\_

Printed Name of Plaintiff \_\_\_\_\_

**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney \_\_\_\_\_

Printed Name of Attorney \_\_\_\_\_

Bar Number \_\_\_\_\_

Name of Law Firm \_\_\_\_\_

Street Address \_\_\_\_\_

State and Zip Code \_\_\_\_\_

Telephone Number \_\_\_\_\_

E-mail Address \_\_\_\_\_